

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO. 19-20379  
HON. DENISE PAGE HOOD

v.

HOUSSAM ALI HACHEM,

Defendant.

\_\_\_\_\_ /

**STIPULATION TO ADJOURN ARRAIGNMENT ON INDICTMENT**

The United States of America and Defendant stipulate and agree that there is good cause to adjourn the completion of Defendant's arraignment on Indictment from December 4, 2019, to December 18, 2019. This extension of time is necessary so that Defendant can retain his counsel of choice. Defendant is charged in a separate federal indictment in Miami. Defendant is on the brink of hiring a local attorney to work on this case in conjunction with Defendant's retained counsel in Miami. Defendant, through his current counsel, concurs in this request and agrees that it is in his best interest.

The parties stipulate and agree that this stipulation and any order resulting therefrom shall not affect any previous order of pretrial detention or pretrial release.

The period from December 4, 2019, to December 18, 2019, should be

excluded from the Speedy Trial Act because the ends of justice served by such continuance outweigh the interests of the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(1) & (7). Specifically, the allegations in this case related to years' long investigation regarding conduct that is nearly ten years old. Defendant wishes to retain a local lawyer to work in conjunction with his lawyer from Miami. Counsel for the government has spoken with both the Miami attorney and a local attorney. Defendant should be making a decision about counsel soon. The requested delay will allow Defendant's preferred attorney to file an appearance, review the indictment and acknowledgment of indictment, and be better prepared for the completion of arraignment. These facts justify the adjournment of the arraignment, and the exclusion of time under the "ends of justice" subsection of the Speedy Trial Act.

**IT IS SO STIPULATED.**

MATTHEW SCHNEIDER  
United States Attorney

s/Kevin Mulcahy  
Kevin Mulcahy  
Assistant United States Attorney  
211 W. Fort Street, Suite 2001  
Detroit, MI 48226  
Kevin.mulcahy@usdoj.gov  
(313) 226-9713

s/ Jonathan Epstein (with consent)  
Jonathan Epstein  
Attorney for Defendant  
Federal Defender Office  
613 Abbott, 5th Floor  
Detroit, MI 48226  
Jonathan\_Epstein@fd.org  
(313) 967-5840

Dated: December 3, 2019

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO. 19-20379

v.

HOUSSAM ALI HACHEM,

Defendant.

\_\_\_\_\_ /

**ORDER ADJOURNING ARRAIGNMENT**

This matter coming before the court on the stipulation of the parties, it is hereby

**ORDERED** that good cause exists to extend the completion of Arraignment in this case, scheduled for December 4, 2019, at 1:00 p.m., to December 18, 2019, at 1:00 p.m. *See* Fed. R. Crim. P. 5.1(d).

It is further **ORDERED** that the period from December 4, 2019, to December 18, 2019, shall be excluded from the speedy trial clock. *See* 18 U.S.C. §§ 3161(h)(1) & (h)(7). These facts set forth in the parties' stipulation are adopted by the Court and the Court finds that the facts justify the adjournment of the arraignment on indictment date, and the exclusion of the time under the "ends of justice" subsection of the Speedy Trial Act.

**IT IS SO ORDERED.**

Dated: December 4, 2019

s/Anthony P. Patti  
Antony P. Patti  
United States Magistrate Judge